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8 *Attorneys for Plaintiff*

9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 PAULINE SANTA CRUZ,

12 Case No.: 3:21-cv-00256-LRH-CLB

13 Plaintiff,
14 vs.

**MOTION TO EXTEND DISCOVERY
PLAN AND SCHEDULING ORDER**

15 FEDERAL EXPRESS CORPORATION,
16 Defendant.

(FIRST REQUEST)

17
18 _____ /
19 Plaintiff by and through her attorneys, hereby respectfully request the Discovery Plan and
20 Scheduling Order in the Joint Case Management Report dated August 16, 2021, (ECF No. 24.), be
21 revised and extended 60 days. This extension is requested due to counsel for Plaintiff having a
22 few COVID scares which caused the office to shut down and an emergency medical situation with
23 a staff member. This extension would allow counsel for Plaintiff additional time to conduct
24 remaining depositions. The extension is not brought for any improper purpose or undue delay.

25 This Motion is unopposed by counsel for Defendant.

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1. Discovery Cut-Off Date(s): The February 28, 2022 discovery cut-off date be extended 60 days up to and including **April 29, 2022**.

2. Dispositive Motions: The March 30, 2022 date for filing dispositive motions shall be extended approximately 60 days up to and including **May 30, 2022**, approximately thirty (30) days after discovery cut-off. Exactly 60 days lands on a Sunday.

3. Pretrial Order: 30 days after the Court's order on dispositive motions.

DATED this 3rd day of February, 2022.

/s/ Mark Mausert
Mark Mausert
Sean McDowell
729 Evans Avenue
Reno, NV 89512

Attorneys for Plaintiff

IT IS SO ORDERED.

Dated: February 4, 2022



UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

I hereby certify, under penalty of perjury that I am an employee of Mark Mausert and Sean McDowell, Esq.; I am over the age of eighteen (18) years; I am not a party to, nor hold an interest in this action; and on the date set below, I sent via the electronic filing system maintained by this court, a true and correct copy of, **MOTION TO EXTEND DISCOVERY PLAN AND SCHEDULING ORDER**, to the addressee(s) listed below:

Brandon Pettes
Christopher Ahearn
FedEx Express
Brandon.pettes@fedex.com
Christopher.Ahearn@fedex.com

Karyn Taylor
Littler
KMTaylor@littler.com

DATED this 3rd day of February, 2022.

/s/ Brittaney Martin
Brittaney Martin
Employee of Mark Mausert &
Sean McDowell